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8 **UNITED STATES BANKRUPTCY COURT**

9 **DISTRICT OF NEVADA**

10 In re:
 11 GREGG WILLIAM CHAMBERS,
 12 Debtor.

13 Case No. BK-S-20-12895-MKN
 14 Chapter 7

15 **STIPULATION REGARDING**
EXTENSION OF DISCOVERY
DEADLINES FOR EVIDENTIARY
HEARING

16 Date of Hearing: N/A
 17 Time of Hearing: N/A

Judge: Honorable Mike K. Nakagawa¹

18 This Stipulation is entered into by and among Ryan A. Andersen (the “Trustee”), the duly
 19 appointed Chapter 7 Trustee in the above-captioned bankruptcy case, by and through his counsel,
 20 Jacob L. Houmand, Esq. and Bradley G. Sims, Esq. of the Houmand Law Firm, Ltd., Eugene
 21 Tumbarello and Shamrock Painting, Inc. (collectively, the “Creditor”) by and through their
 22 counsel of record, R. Christopher Reade, Esq., and Gregg Williams Chambers (the “Debtor”, and
 23 together with the Trustee and the Creditor, the “Parties”), based on the following:

24 **I. RECITALS**

25 1. On June 17, 2020, the Debtor filed a voluntary bankruptcy pursuant to Chapter 7
 26 of Title 11 of the United States Code. [ECF No. 1].

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 28 ¹ All references to “ECF No.” are to the numbers assigned to the documents filed in the case as
 they appear on the docket maintained by the clerk of the court.

1 2. On June 17, 2020, the Debtor filed a Schedule C, claiming various exemptions,
 2 including an exemption in the Robin Circle Property in the amount of \$203,091.00 pursuant to
 3 N.R.S. §§ 21.090(1)(l), 115.005, 115.010, 115.050 and an exemption in various tools under
 4 N.R.S. § 21.090(1)(d). See Schedule C. [ECF No. 1], pp. 22-24.

5 3. On June 17, 2020, the Debtor filed a Statement of Financial Affairs, identifying the
 6 sale of the Dean Court Property and provided that a balance of \$40,000.00 remained in escrow.
 7 See [ECF No. 1] p. 48.

8 4. On June 23, 2020, the Trustee was appointed as the successor Chapter 7 Trustee in
 9 the Debtor's bankruptcy case. [ECF No. 18].

10 5. On February 26, 2021, the Debtor filed an amended Schedule C (the "Second
 11 Amended Schedule C") that asserts exemptions in, inter alia, the Robin Circle Property in the
 12 amount of \$268,091.00 pursuant to N.R.S. §§ 21.090(1)(l), 115.005, 115.010, and 115.050; an
 13 exemption in the Proceeds in the amount of \$ 8,367.00 pursuant to N.R.S. § 21.090(1)(z); an
 14 exemption in the Proceeds in the amount of \$35,633.00pursuant to N.R.S. § 21.090(1)(g), and an
 15 exemption in "SCAFFOLDING, LADDERS, BRUSHES, HAND TOOLS, PAINT SPRAYERS,
 16 SAWS, CHOPSAWS, DRILLS, MIXURES [sic]" pursuant to N.R.S. § 21.090(1)(d). [ECF No.
 17 154] p. 3-5.

18 6. On or about February 26, 2021, The Debtor filed an Amended Statement of
 19 Financial Affairs. [ECF No. 157] p. 3.

20 7. On March 23, 2021, the Trustee filed an *Objection to Debtor's Claim of*
 21 *Exemptions Pursuant to 11 U.S.C. § 522(l) and Federal Rule of Bankruptcy Procedure 4003.*
 22 [ECF No. 160] (the "Objection").

23 8. On March 29, 2021, the Creditor filed a *Joinder in Trustee's Objection to Debtor*
 24 *Gregg Chamber's Claim of Exemptions Pursuant to 11 U.S.C. 522 & Federal Rule of Bankruptcy*
 25 *Procedure 4003.* [ECF No. 168] (the "Joinder").

26 9. On April 8, 2021, the Debtor filed an amended Schedule C, increasing his claimed
 27 homestead exemption. [ECF No. 169].

28 10. On April 8, 2021, the Debtor filed an *Opposition to Trustees Objection to Debtors*

1 *Claim of Exemption Pursuant to 11 U.S.C. §522(l) and Federal Rule of Bankruptcy Procedure*
 2 *4003.* [ECF No. 170].

3 11. On April 15, 2021, the Trustee filed a *Reply to Opposition to Objection to Debtors*
 4 *Claim of Exemptions Pursuant to 11 U.S.C. § 522(l) and Federal Rule of Bankruptcy Procedure*
 5 *4003.* [ECF No. 171].

6 12. On April 16, 20201, the Creditor filed a *Reply in Support of Joinder in Trustee's*
 7 *Objection to Debtor Gregg Chamber's Claim of Exemption.* [ECF No. 172].

8 13. On April 28, 2021, the Court held a hearing on the Objection and determined that
 9 an evidentiary hearing was required to resolve some of the claims alleged in the Objection.

10 14. The Parties were tasked with creating a discovery plan prior to the scheduling of
 11 an evidentiary hearing.

12 15. On May 7, 2021, the Trustee filed a *Supplemental Objection to Debtor's Amended*
 13 *Claim of Exemptions Pursuant to 11 U.S.C. § 522(l) and Federal Rule of Bankruptcy Procedure*
 14 *4003* [ECF No. 175] (the "Supplement").

15 16. On May 11, 2021, the Parties filed a *Stipulation Regarding Deadlines for*
 16 *Evidentiary Hearing* [ECF No. 176] (the "Stipulation").

17 17. On May 13, 2021, the Court entered an *Order Granting Stipulation Regarding*
 18 *Deadlines for Evidentiary Hearing* [ECF No. 177] which granted the Stipulation and established
 19 the a Discovery Cut-Off Date of August 11, 2021.

20 18. The Parties have met and conferred and agreed that additional time is required for
 21 discovery.

22 **II. STIPULATION**

23 NOW, THEREFORE, based on the foregoing, and subject to Court approval, the Parties
 24 agree as follows:

- 25 1. The Parties shall have an additional two weeks to conduct discovery.
- 26 2. That the new discovery deadline shall be August 25, 2021.

1 3. That this Stipulation is without prejudice to any of the Parties requesting a further
2 extension of the discovery deadlines as modified herein, from the Court for cause
3 shown.

4 **4. IT IS SO STIPULATED.**

5 Dated this 6th day of August, 2021.

6 By: /s/ Bradley G. Sims, Esq.
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9 *Counsel for Ryan A. Andersen, Chapter 7
10 Trustee*

Dated this 6th day of August, 2021.

By: /s/ Christopher P. Burke
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Counsel for the Debtor

11 Dated this 6th day of August, 2021.

12 By: /s/ R. Christopher Reade
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